

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT COURT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS,
INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendants.

Civil Action No. 1:14-cv-14176-DJC

Declaration of J.L.

I, S.C. declare the following:

1. The facts set forth in this declaration are based on my personal first-hand knowledge, and if called as a witness, I could and would competently testify to the following matters under oath.
2. I identify as Korean American. I am currently a junior at Harvard University, majoring in Cognitive Neuroscience and Evolutionary Psychology with a secondary in History of Art and Architecture.
3. I was born in Korea and immigrated to Texas when I was five years old. I grew up in Flower Mound, Texas, an affluent suburb of Dallas that is predominantly white. My parents own a donut shop and have worked incredibly hard to provide my older brother and I with the privileges of a middle class lifestyle. My parents only knew how to speak broken English and I frequently had to serve as their interpreters. Many of my high school peers stereotyped me as a hard working Asian with no other passions besides homework and studying.

4. I attended Flower Mound High School, one of the best public high schools in Texas. At Flower Mound, I excelled academically, but art was my true passion. I played violin, served as the President of the Art Club/ National Art Society, founded an advocacy organization and served as the Vice President of Creative Engagement and Design, and received numerous awards for my artwork, including a Gold Seal at the Visual Arts Scholastic Event, the most prestigious art award available for Texas high school students. I also engaged in significant public service in high school, including volunteering at my church during my summers.
5. I scored a 2330 on my SAT and graduated 6th in my class. I applied to every Ivy League college except the University of Pennsylvania, including early action to Yale, but I was rejected or waitlisted at every school except Harvard. In my general application, I discussed my love of art, but in my Harvard supplement, I discussed my intersecting identities, with a heavy emphasis on my Korean identity.
6. I do not believe that Harvard uses affirmative action to discriminate against Asian Americans. After all, I freely discussed my racial background in my essay and was still admitted, even though a college consultant told me that I did not have a shot at any Ivy League school. I also believe that my college application experience highlights the fact that college admissions is about more than merit because I was accepted to only one Ivy League school even though they all have similar standards for admission.
7. In addition to benefiting directly from Harvard's race conscious admissions policy, I believe that I have also benefited indirectly. Harvard is substantially more diverse than my homogeneously white high school and it has given me the opportunity to interact with many different people. I believe that Harvard's race conscious admissions policy is responsible for much of its diversity. Since coming to Harvard, I have been very involved in the Phillips Brooks House Association (PBHA), the nation's largest student-run public

service non-profit that serves more than 10,000 individuals in and around the greater Boston area. PBHA is a hub for diverse student organizing on campus and has challenged me to develop a deeper commitment to social justice. I am currently an Officer for PBHA and I also serve as the Co-Director of the Boston Refugee Youth Enrichment (BRYE) program, which serves low-income youth in Dorchester. I have also engaged in psychology research on racism, prejudice, intersectionality, and the development of hierarchies in children.

8. Overall, the presence of students of color on campus is vital to the College's student organizations, its learning environment, and mission for public service and social justice. So many students engaged in social justice work approach it through the lens of their own experiences. If there were fewer underrepresented minorities on campus, Harvard would lack a divergent set of perspectives to help inform our social justice work. The community would absolutely suffer, particularly given that the advocacy on campus is really cross-racial. Students of all races and ethnicities have advocated for an ethnic students program, for additional spaces for students of color, and for the University to change how it signals importance on campus with portraits, seals, and names of buildings.
9. I support Harvard's race-conscious admissions policy. I wrote freely about my Korean heritage and its impact on my life during the admissions process and I was admitted, even though I was not admitted to any other Ivy League school. My application experience demonstrates that Harvard (and other Ivy League schools) evaluate many factors in making admissions decisions and are not actively discriminating against Asian Americans. Race conscious admissions is not a panacea for all of the inequity in the education system or on college campuses, but I believe it is a critical policy to open the doors to an elite university like Harvard for all students of color, including Asian Americans like me.

I declare under the penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct and that this declaration was executed on March 20th, 2018, in Cambridge, Massachusetts.

J.L.